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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF UTAH**

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ERIC SCHIERMEYER, Derivatively on Behalf  
of Nominal Defendant, BLOCKCHAIN GAME  
PARTNERS, INC. D/B/A GALA GAMES,

Plaintiff,

vs.

WRIGHT THURSTON and TRUE NORTH  
UNITED INVESTMENTS, LLC,

Defendants,

and

BLOCKCHAIN GAME PARTNERS, INC.  
D/B/A GALA GAMES,

Nominal Defendant.

**DECLARATION OF TRAVIS  
ALLEN IN SUPPORT OF  
PLAINTIFF ERIC  
SCHIERMEYER'S MOTION FOR  
ORDER FREEZING ASSETS, AN  
ACCOUNTING, PERMITTING  
EXPEDITED DISCOVERY AND  
OTHER ANCILLARY RELIEF**

Case No. 2:23-cv-00589-HCN-DAO  
Judge Howard C. Nielson  
Magistrate Judge Daphne A. Oberg

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**DECLARATION OF TRAVIS ALLEN IN SUPPORT OF PLAINTIFF'S MOTIONS**

## SECOND DECLARATION OF TRAVIS ALLEN

1. I, Travis Allen, am a Blockchain Engineer for Blockchain Game Partners, Inc., d/b/a Gala Games (“Gala Games”). In my role as Blockchain Engineer, I am familiar with both the day-to-day operations and the overall operations of Gala Games. As such, I have knowledge of the facts set forth herein and could and would testify competently thereto if called upon to do so. I also am familiar with the records of Gala Games, which I consulted in order to determine the numbers set forth herein, all of which are business records maintained in Gala Games’ files and systems in the ordinary course of business.

2. This is the second declaration I have submitted in this action, and it supplements, and adopts the definitions in, my first declaration.

3. I have access to and reviewed an early version of the Gala Games code which controls the distribution of the daily emission of GALA. The code is time-stamped Monday, August 3, 2020 at 21:20:25 Mountain Time. Below is a screenshot of the portion of that code which allocates the daily distribution of GALA between “company” and “users.”

```
private getDailyDistributionAmount() {
  const dailyDistributionAmount =
    tokenConfig[config.tokenName].annualDistributionAmount /
    getDaysInYear(new Date());

  return {
    total: dailyDistributionAmount,
    company: dailyDistributionAmount * 0.75,
    users: dailyDistributionAmount * 0.25,
  };
}
```

4. This code operated to distribute 75% of the daily emission of GALA to the “company” wallet and 25% of the daily emission of GALA to the “users” who were operating their Gala Nodes.

1           5.       This portion of code was added on January 31, 2020 at 9:39 a.m. by user  
2 “jaydenj133.”

3           I declare, under penalty of perjury of the laws of Utah and of the United States  
4 of America, that the foregoing is true and accurate.

5  
6 Dated: September 13, 2023

DocuSigned by:

Travis Allen

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Travis Allen

Blockchain Engineer

Blockchain Game Partners, Inc.